

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

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**CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING CITY OF  
DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501,  
AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND  
3003(C), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND  
APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST HELAINA  
PERRY [DOC. NO. 9954]**

On June 10, 2015, the City Of Detroit ("City") filed its Motion to Enforce Order, Pursuant To Sections 105, 501, and 503 Of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof Against Helaina Perry ("Motion"). [Doc. No. 9954]. As set forth more fully in the Motion, the Motion sought to enforce this Court's claims bar date order and prohibit Helaina Perry from continuing to prosecute an action against the City currently pending in Wayne County Circuit Court ("State Court Action"). The City served the Motion, via email and first class mail, upon Ms. Perry's counsel in the State Court Action, Mr. Jonathan Hirsch. *See Certificate of Service*, Exhibit A. Mr. Hirsch responded to the City's email by stating that he "withdrew on the case. I no longer represent Ms. Perry. You need to serve her with the Motion." *See Exhibit B*. The City replied to Mr. Hirsch stating that it had "...checked the docket of the state court lawsuit in Wayne County Circuit Court and there is not an order granting your motion to withdraw as counsel. If I am mistaken and there has been an order entered permitting you to withdraw as counsel, please send it to me. Please also send me Ms. Perry's address so that I can mail the motion to her as well." *Id.* Mr. Hirsch did not reply this request.

Counsel for the City then attempted to locate a valid address for Helaina Perry. On June 11, 2015, the City served the Motion via first class mail to what it believed to be a valid address for Ms. Perry. *See Supplemental Certificate of Service*, Exhibit C. [Doc. No. 9963]. However, on June 29, 2015, counsel for the City received the mailing to Helaina Perry as returned mail, marked "Return to Sender; Attempted-Not Known; Unable to Forward." Mr. Hirsch filed another motion to withdraw as counsel in the State Court Action on June 25, 2015 and noticed this second motion for hearing on July 10, 2015. *See Ex. D.*

Pursuant to MCR 2.117(C), Mr. Hirsch is Ms. Perry's counsel until an order is entered in the State Court Action permitting him to withdraw. MCR 2.117(C)(2) ("An attorney who has entered an appearance may withdraw from the action or be substituted for only on order of the court."). While Mr. Hirsch has filed two separate motions to withdraw as counsel, no order has been entered approving his withdrawal.

No response or objection to the Motion was filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion. *See Proposed Order* Exhibit E.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Marc N. Swanson  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
swanson@millercanfield.com  
green@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT

DATED: July 7, 2015

## **Exhibit A**

**EXHIBIT 4 – CERTIFICATE OF SERVICE**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846  
Honorable Thomas J. Tucker  
Chapter 9

The undersigned hereby certifies that on June 10, 2015, he served a copy of the foregoing  
***CITY OF DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105,  
501, AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND  
3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND  
APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST HELAINA  
PERRY*** upon counsel, as listed below, via electronic mail and first class mail:

Jonathan C. Hirsch  
59 N Walnut St Ste 304  
Mount Clemens, MI 48043  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

DATED: June 10, 2015

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

## **Exhibit B**

**From:** Swanson, Marc N.  
**Sent:** Wednesday, June 10, 2015 4:25 PM  
**To:** jonathanhirsch@yahoo.com  
**Cc:** Wysocki, Robin; Swanson, Marc N.  
**Subject:** RE: Service: City Of Detroit's Motion To Enforce Order re Helaina Perry

Jonathan,

I emailed you last evening and called you twice today but did not hear back. We checked the docket of the state court lawsuit in Wayne County Circuit Court and there is not an order granting your motion to withdraw as counsel. If I am mistaken and there has been an order entered permitting you to withdraw as counsel, please send it to me. Please also send me Ms. Perry's address so that I can mail the motion to her as well.

Thanks,

Marc

---

**Marc N. Swanson** | Principal  
**Miller Canfield**  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226 (USA)  
**T** +1.313.496.7591 | **F** +1.313.496.8451 | **Mobile** +1.248.766.7159  
swansonm@millercanfield.com | View Profile + VCard  
<http://www.millercanfield.com/MarcSwanson>

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**From:** Jonathan Hirsch [<mailto:jonathanhirsch@yahoo.com>]  
**Sent:** Wednesday, June 10, 2015 4:16 PM  
**To:** Wysocki, Robin  
**Subject:** Re: Service: City Of Detroit's Motion To Enforce Order re Helaina Perry

I withdrew on this case. I no longer represent Ms. Perry. You need to serve her with the Motion.

Thank you,

**Jonathan C. Hirsch**  
THE HIRSCH LAW FIRM, PLLC  
59 N. Walnut St., Suite 304  
Mt. Clemens, MI 48043  
P (586) 445-0900  
F (586) 789-9033

CONFIDENTIALITY NOTE: The information contained in this message may be privileged, confidential, and protected from disclosure. If the reader of this message is not the intended recipient,

or any employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer.

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**From:** "Wysocki, Robin" <[wysocki@MillerCanfield.com](mailto:wysocki@MillerCanfield.com)>  
**To:** "[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)" <[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)>  
**Sent:** Wednesday, June 10, 2015 3:48 PM  
**Subject:** Service: City Of Detroit's Motion To Enforce Order re Helaina Perry

Please see the attached motion filed with the court today.

Best regards,

Robin Wysocki  
Paralegal  
Miller, Canfield, Paddock and Stone, P.L.C.  
150 W. Jefferson Avenue, Suite 2500  
Detroit, MI 48226  
Ph. (313) 496-7631  
Fax: (313) 496-8452  
[wysocki@millercanfield.com](mailto:wysocki@millercanfield.com)



## **Exhibit C**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**SUPPLEMENTAL CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 11, 2015, he served a copy of ***CITY OF DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST HELAINA PERRY*** upon Helaina Perry, as listed below, via first class mail:

Helaina Perry  
4220 Holcomb St.  
Detroit, MI 48214

DATED: June 11, 2015

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

## **Exhibit D**

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## REGISTER OF ACTIONS

[CASE No. 14-013963-NI](#)

### PARTY INFORMATION

Defendant	City of Detroit	Lead Attorneys Mary Beth Cobbs <i>Retained</i> (313) 237-3075(W)
Defendant	Harris, Michael	Mary Beth Cobbs <i>Retained</i> (313) 237-3075(W)
Plaintiff	Perry, Helaina	Jonathan C. Hirsch <i>Retained</i> (586) 445-0900(W)

### EVENTS & ORDERS OF THE COURT

	<b>OTHER EVENTS AND HEARINGS</b>
10/29/2014	Service Review Scheduled
10/29/2014	Status Conference Scheduled
10/29/2014	Complaint, Filed
10/29/2014	<a href="#">Case Filing Fee - Paid</a>
11/07/2014	<a href="#">Miscellaneous Pleadings, Filed</a>
01/27/2015	Status Conference (11:30 AM) (Judicial Officer Murphy, John A.) 01/28/2015 Reset by Court to 01/30/2015 01/30/2015 Reset by Court to 01/27/2015 Result: Reviewed by Court
01/28/2015	<a href="#">Status Conference Scheduling Order, Signed and Filed</a> (Judicial Officer: Murphy, John A. )
02/05/2015	<a href="#">Answer to Complaint, Filed</a>
03/13/2015	<a href="#">Order Substituting Plaintiff Attorney, Signed and Filed</a>
04/21/2015	<a href="#">Motion to Withdraw as Attorney, Filed</a>
04/27/2015	<a href="#">Praecipe, Filed</a> (Judicial Officer: Murphy, John A. )
05/11/2015	<a href="#">Praecipe, Filed</a> (Judicial Officer: Murphy, John A. )
05/22/2015	CANCELED Motion Hearing (9:00 AM) (Judicial Officer Murphy, John A.) Dismiss Non-Appearance
05/22/2015	CANCELED Motion Hearing (9:00 AM) (Judicial Officer Murphy, John A.) Scheduling Error
06/25/2015	<a href="#">Notice of Hearing, Filed</a>
06/25/2015	<a href="#">Motion to Withdraw as Attorney, Filed</a>
08/03/2015	Case Evaluation - General Civil
09/17/2015	Settlement Conference (9:30 AM) (Judicial Officer Murphy, John A.)

### FINANCIAL INFORMATION

	Plaintiff Perry, Helaina	
	Total Financial Assessment	40.00
	Total Payments and Credits	40.00
	<b>Balance Due as of 06/29/2015</b>	<b>0.00</b>
04/21/2015	Transaction Assessment	20.00
04/21/2015	Civil File & Serve Payment Receipt # 2015-34535	Perry, Helaina (20.00)
06/25/2015	Transaction Assessment	20.00
06/25/2015	Civil File & Serve Payment Receipt # 2015-55277	Perry, Helaina (20.00)

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

vs

Case No: 14-013963-NI

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

14-013963-NI

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WAYNE COUNTY CLERK

6/25/2015 4:12:06 PM

CATHY M. GARRETT

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

CITY OF DETROIT LAW DEPT  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**RE-NOTICE OF HEARING**

PLEASE TAKE NOTICE that Plaintiff's counsel will bring his Motion to  
Withdraw as Counsel for Plaintiff on for hearing before this Honorable  
Court, on **Friday, July 10, 2015 at 9:00 a.m.** or as soon thereafter as  
may be heard.

/s/ Jonathan C. Hirsch

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
59 N. Walnut Street, Suite 304  
Mt. Clemens, MI 48043  
(586) 445-0900

Dated: June 25, 2015

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

Case No: 14-013963-NI

vs

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

14-013963-NI

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CATHY M. GARRETT

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

NOW COMES Plaintiff's Counsel, THE HIRSCH LAW FIRM, PLLC,  
and for their Motion to Withdraw as counsel for Plaintiff states as follows:

1. This is a 3<sup>rd</sup> Party Automobile Negligence lawsuit.
2. Plaintiff's counsel recently substituted in as counsel for  
Plaintiff.
3. Plaintiff's counsel has had repeated disturbing conversations  
with Plaintiff.
4. There has been a breakdown in the attorney client relationship.
5. Plaintiff's counsel should be allowed to withdraw as counsel for  
Plaintiff.

**WHEREFORE**, Plaintiff's counsel prays this Honorable Court grant  
its Motion to Withdraw as counsel for Plaintiff.

/s/ Jonathan C. Hirsch  
THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
59 N. Walnut, Ste 304  
Mount Clemens, MI 48043  
(586) 445-0900  
jonathanhirsch@yahoo.com

**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

HELAINA PERRY

Plaintiff,  
vs

Case No: 14-013963-NI  
Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

---

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

---

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**PLAINTIFF'S BRIEF IN SUPPORT OF MOTION TO WITHDRAW AS  
COUNSEL**

Plaintiff's counsel hereby relies on the facts set forth in the foregoing Motion and MRPC 1.16 in support of his Motion to Withdraw as Plaintiff's counsel.

/s/ Jonathan C. Hirsch  
THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut, Ste 304  
Mount Clemens, MI 48043  
(586) 445-0900



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

vs

Case No: 14-013963-NI

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

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WAYNE COUNTY CLERK  
4/21/2015 10:22:07 AM  
CATHY M. GARRETT

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

**MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

NOW COMES Plaintiff's Counsel, THE HIRSCH LAW FIRM, PLLC,  
and for their Motion to Withdraw as counsel for Plaintiff states as follows:

1. This is a 3<sup>rd</sup> Party Automobile Negligence lawsuit.
2. Plaintiff's counsel recently substituted in as counsel for Plaintiff.
3. Plaintiff's counsel has had repeated disturbing conversations with Plaintiff.
4. There has been a breakdown in the attorney client relationship.
5. Plaintiff's counsel should be allowed to withdraw as counsel for Plaintiff.

**WHEREFORE**, Plaintiff's counsel prays this Honorable Court grant  
its Motion to Withdraw as counsel for Plaintiff.

/s/ Jonathan C. Hirsch  
THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
59 N. Walnut, Ste 304  
Mount Clemens, MI 48043  
(586) 445-0900  
jonathanhirsch@yahoo.com

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

vs

Case No: 14-013963-NI

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

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THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

---

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**PLAINTIFF'S BRIEF IN SUPPORT OF MOTION TO WITHDRAW AS  
COUNSEL**

Plaintiff's counsel hereby relies on the facts set forth in the foregoing Motion and MRPC 1.16 in support of his Motion to Withdraw as Plaintiff's counsel.

/s/ Jonathan C. Hirsch  
THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut, Ste 304  
Mount Clemens, MI 48043  
(586) 445-0900

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

vs

Case No: 14-013963-NI

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

---

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
Attorneys for Plaintiff  
59 N. Walnut Street, Suite 304  
Mount Clemens, MI 48043  
(586) 445-0900  
[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

---

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**NOTICE OF HEARING**

PLEASE TAKE NOTICE that Plaintiff's counsel will bring his Motion to  
Withdraw as Counsel for Plaintiff on for hearing before this Honorable  
Court, on **Friday, May 1, 2015 at 9:00 a.m.** or as soon thereafter as  
may be heard.

/s/ Jonathan C. Hirsch

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
59 N. Walnut Street, Suite 304  
Mt. Clemens, MI 48043  
(586) 445-0900

Dated: April 20, 2015

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument was  
served upon all parties to the above cause to each of the  
attorneys of records herein at their respective addresses as  
indicated on the pleadings on April 20, 2015 via US Mail.

---

Jonathan C. Hirsch

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HELAINA PERRY

Plaintiff,

vs

Case No: 14-013963-NI

Hon. John A. Murphy

MICHAEL HARRIS and CITY OF DETROIT,  
A Michigan corporation Municipal Corporation,

Defendants.

---

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
LAUREN SNIDERMAN HIRSCH (P46111)  
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59 N. Walnut Street, Suite 304  
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[jonathanhirsch@yahoo.com](mailto:jonathanhirsch@yahoo.com)

---

CITY OF DETROIT LAW DEPT.  
MARY BETH COBBS (P40080)  
Attorney for Defendant  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3075

---

**RE-NOTICE OF HEARING**

PLEASE TAKE NOTICE that Plaintiff's counsel will bring his Motion to  
Withdraw as Counsel for Plaintiff on for hearing before this Honorable  
Court, on **Friday, May 22, 2015 at 9:00 a.m.** or as soon thereafter as  
may be heard.

/s/ Jonathan C. Hirsch

THE HIRSCH LAW FIRM, PLLC  
JONATHAN C. HIRSCH (P46952)  
59 N. Walnut Street, Suite 304  
Mt. Clemens, MI 48043  
(586) 445-0900

Dated: May 7, 2015

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of records herein at their respective addresses as indicated on the pleadings on May 14, 2015 via E-Filing System.

/s/Jonathan C. Hirsch  
Jonathan C. Hirsch

## **Exhibit E**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT'S MOTION TO ENFORCE ORDER,  
PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND  
BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING  
PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE  
THEREOF AGAINST HELAINA PERRY**

This matter, having come before the Court on the Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Helaina Perry ("Motion"), upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

**THE COURT ORDERS THAT:**

1. The Motion is granted.
2. Within five days of the entry of this Order, Helaina Perry shall dismiss, or cause to be dismissed, with prejudice the action captioned as *Helaina Perry, Plaintiff, v. Michael Harris and City of Detroit, Defendants*, filed in the Wayne County Circuit Court and assigned Case No. 14-013963 ("State Court Action").
3. Helaina Perry is permanently barred, estopped and enjoined from asserting the claims arising from or related to the State Court Action against the City of Detroit or property of the City of Detroit.



4. Helaina Perry is prohibited from sharing in any distribution in this bankruptcy case.

5. The Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.